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BY: BRUCE H. LEVITT, ESQ. (BL9302)
Attorney for the Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:	:	
	:	Case No.: 19-20191
SIMON ROJAS,	:	
	:	CHAPTER 13
	:	
	:	NOTICE OF MOTION TO VACATE
Debtor.	:	ORDER OF JULY 28, 2022 AND
	:	REINSTATE AUTOMATIC STAY
	:	

To: Albert Russo, Standing Trustee
1 AAA Drive, Suite 101
Robbinsville, New Jersey 08691

Christopher Lugara, Esq.
Cutolo Barros, LLC
46-50 Throckmorton Street
Freehold, NJ 07728
Attorneys for Renaissance at Franklin
Master Association, Inc.

Please take notice that the undersigned counsel for Debtor Simon Rojas, will move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, 402 E. State Street, Trenton, New Jersey 08652, Courtroom on the 12th day of October, 2022 at 9:00 a.m. or as soon thereafter as counsel may be heard, for entry of an Order

Vacating Order of July 28, 2022 and Reinstating the Automatic Stay as to Renaissance Franklin Master Association, Inc.

In support of the instant motion, the undersigned shall rely on the Certification of Debtor submitted herewith.

Responsive pleadings, if any, shall be filed with the Clerk of the Bankruptcy Court, 402 E. State Street, Trenton, New Jersey 08625 and served upon the undersigned no more than seven days prior to the return date hereof.

LEVITT & SLAFKES, P.C.
Attorneys for Debtor

By: /s/Bruce H. Levitt
Bruce H. Levitt

Dated: September 9, 2022